

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

Case No.: 15-30451
Judge: G. Michael
Halfenger
Chapter: Chapter 13

**In Re: Randey D Anderson
Regina A Anderson**

NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN

Geraci Law, LLC, Attorneys for the Debtors, have filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, on or before 21 days from the date of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk, U.S. Bankruptcy Court
517 E. Wisconsin Ave., Rm. 126
Milwaukee, WI 53202

If you mail your request or response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to the parties listed below and on the attached mailing matrix:

Felicia Marie Petroff
Geraci Law, LLC
2505 N. Mayfair Road, Suite 101
Wauwatosa, WI 53226
Phone: (414) 475-6052
Fax: (877) 247-1960
Email: wal@geracilaw.com

United States Trustee
Eastern District of Wisconsin
517 East Wisconsin Avenue, Room 430
Milwaukee, WI 53202

Mary B. Grossman
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203

Geraci Law, LLC
Felicia Marie Petroff
2505 N. Mayfair Rd. #101
Wauwatosa, WI 53226

Randey D Anderson
Regina A Anderson
4339 N 36th St
Milwaukee, WI 53216

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponents of this modification are the Debtors, through their Attorneys, Geraci Law, LLC.
2. This is a request to modify a Chapter 13 Plan (Select A. or B.):
 - A. _____ post-confirmation
 - B. X pre-confirmation (Select i. or ii.):
 - i. X Debtors/Debtors' attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
 - ii. _____ Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors are (See Attached List).
3. The Proponents wish to modify the Chapter 13 Plan to do the following: See Below.
4. The reason for the modification is to adjust how plan payments are made.

5. Select A. or B.

A. _____ The confirmed Chapter 13 Plan is modified as follows:

B. X The unconfirmed Chapter 13 Plan is modified as follows: The Debtors are now separated and would like to split the plan payments between them. Mr. Anderson will continue to make payments by payroll deductions, but the amount will be reduced to \$425 per month. Mrs. Anderson will make debtor-direct payments of \$425 per month.

C. All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

6. BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.

WHEREFORE, the Proponents request that the Court approve the modification to the

Chapter 13 Plan as stated herein.

Respectfully submitted and dated this Monday, January 18, 2016.

By: /s/ Felicia Marie Petroff
Felicia Marie Petroff
Attorney for Debtor
Bar #: 1066358

Felicia M. Petroff
Geraci Law, LLC
2505 N. Mayfair Road, Suite 101
Wauwatosa, WI 53226
Phone: (312) 809-2983, ext. 580
Fax: (877) 247-1960
Email: wal@geracilaw.com

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

Case No.: 15-30451
Judge: G. Michael Halfenger
Chapter: Chapter 13

**In Re: Randey D Anderson
Regina A Anderson**

CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Request to Modify Chapter 13 Plan were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Monday, January 18, 2016:

Randey Anderson
Regina A Anderson
4339 N 36th St
Milwaukee, WI 53216

Additionally, the documents referenced above were also served via electronic means on the following individuals on Monday, January 18, 2016:

United States Trustee
Eastern District of Wisconsin
517 E. Wisconsin Ave.
Milwaukee, WI 53202

Mary B. Grossman
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203

Dated this Monday, January 18, 2016.

By: /s/ Felicia Marie Petroff
Felicia Marie Petroff
Attorney of the Debtor
Bar #: 1066358

Felicia M. Petroff
Geraci Law, LLC
2505 N. Mayfair Road, Suite 101
Wauwatosa, WI 53226
Phone: (312) 809-2983, ext. 580
Fax: (877) 247-1960
Email: wal@geracilaw.com

Rec. No: «c_recordno»
Notice and Request to Modify Chapter 13 Plan